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PUBLIC UTILITY COMMISSIO

OCT 16 2020

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PUC DOCKET NO. 51415

APPLICATION OF SOUTHWESTERN **ELECTRIC POWER COMPANY FOR**

§ § AUTHORITY TO CHANGE RATES

§

OF TEXAS

OFFICE OF PUBLIC UTILITY COUNSEL'S **MOTION TO INTERVENE**

Pursuant to Texas Utilities Code §§ 13.001 and 13.003(a)(3)(A)-(B), and 16 Texas Administrative Code § 22.103(b), the Office of Public Utility Counsel ("OPUC") moves to intervene in this proceeding as a matter of right on behalf of the residential and small commercial consumers in Southwestern Electric Power Company's ("SWEPCO") service territory. OPUC's Chief Executive and Public Counsel has determined that residential and small commercial consumers in SWEPCO's service territory are in need of representation in this proceeding. Therefore, OPUC has standing to participate in this proceeding that is expressly conferred by statute.

Dated: October 16, 2020

Respectfully submitted,

Lori Cobos Chief Executive & Public Counsel State Bar No. 24042276

Zachary Stephenson Assistant Public Counsel State Bar No. 24073402 Tucker Furlow Senior Assistant Public Counsel State Bar No. 24060897 Chris Ekoh

Senior Managing Public Counsel State Bar No. 06507015

OFFICE OF PUBLIC UTILITY COUNSEL 1701 N. Congress Avenue, Suite 9-180 P.O. Box 12397 Austin, Texas 78711-2397

512-936-7500 (Telephone) 512-936-7525 (Facsimile) zachary.stephenson@opuc.texas.gov tucker.furlow@opuc.texas.gov chris.ekoh@opuc.texas.gov opuc_eservice@opuc.texas.gov (Service)

CERTIFICATE OF SERVICE

PUC DOCKET NO. 51415

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 16th day of October 2020, by facsimile, electronic mail, and/or first class, U.S. Mail.

Zachary Stephenson